

**SUSMAN GODFREY L.L.P.**

A REGISTERED LIMITED LIABILITY PARTNERSHIP  
SUITE 5100  
1000 LOUISIANA STREET  
HOUSTON, TEXAS 77002-5096  
(713) 651-9366  
FAX (713) 654-6666  
WWW.SUSMANGODFREY.COM

SUITE 1400  
1900 AVENUE OF THE STARS  
LOS ANGELES, CALIFORNIA 90067-6029  
(310) 789-3100

SUITE 3000  
401 UNION STREET  
SEATTLE, WASHINGTON 98101-2683  
(206) 516-3880

ONE MANHATTAN WEST  
NEW YORK, NEW YORK 10001-8602  
(212) 336-8330

June 17, 2025

**VIA ECF**

Hon. Ona T. Wang  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

Re: In re: OpenAI Inc., Copyright Infringement Litigation, 25-md-3143 (SHS) (OTW)  
This Document Relates To: All Actions

Dear Judge Wang:

Per the Court's May 29 Order (Dkt. 78), on behalf of all Parties, please see attached charts containing summaries of the discovery disputes for discussion at the upcoming June 25, 2025, conference. Exhibit A summarizes global case management matters relating to all parties (including all Plaintiffs). Exhibit B contains a chart summarizing the discovery disputes in the Class Cases, and Exhibit C contains a chart summarizing the discovery disputes in the News Cases.

Sincerely,

/s/Justin Nelson

Justin Nelson

/s/Davida Brook

Davida Brook